Tukwila for Seattle file

CH2MHILL

FEB 20 1995

**TECHNICAL STATUS REPORT**

**PREPARED FOR:** Tom Post/EPA Region 10

**COPIES TO:** Byung Maeng/Ecology

**PREPARED BY:** Liz Luecker/CH2M HILL

**DATE:** February 10, 1995

**SUBJECT:** Rhône-Poulenc Monthly Status Report

**SITE NAME AND LOCATION:** Rhône-Poulenc Inc./Seattle Plant
Tukwila, WA

**REPORTING PERIOD:** January 1 through January 31, 1995

**PROJECT:** NPE35051.A1

Following is CH2M HILL's technical status report summary for the RCRA Corrective Action Project at Rhône-Poulenc's (RPI) Seattle Plant. This status report summarizes activities implemented and planned for this Corrective Action project and is intended to be transmitted to U.S. EPA Region 10 in fulfillment of the monthly progress reports required in Consent Order No. 1091-11-20-3008(h).

## Progress Made This Reporting Period

### *Task A1-Project Management*

Patt O'Flaherty, CH2M HILL's project manager, changed her work status from full to part time effective December 24, 1994. Due to this change, Ms. O'Flaherty is unable to continue as project manager. Liz Luecker has been proposed to RPI as the new project manager. RPI is evaluating her qualifications and will submit a formal proposal to EPA.

### *Task A2-Applicable Regulations and Permits*

Storm Water Permitting. On January 10, 1995, Sue Hays/Hays Consulting sent a letter to Glenn Pieritz/Industrial Storm Water Unit, Washington Department of Ecology. This letter stated that a NPDES Baseline General Permit for Stormwater Discharges Associated with Industrial Activity is not needed, based on conversations with Mr. Pieritz; the letter requested a written response from Mr. Pieritz verifying this understanding. Two Notices of Intent for Baseline General Permit to Discharge Storm Water Associated with Industrial Activity were sent to Mr. Pieritz by Ms. Hays on January 24; these Notices were

requested to be attached to the January 10 letter. These Notices were for planned operations by Northwest Container Services and for the portion of the site that will not be leased to Northwest Container Services a renewal of Discharge Authorization No. 427 (expires June 16, 1995) from Metro on behalf of RPI.

METRO Discharge. On December 21, 1994, the Facility exceeded the METRO limit of 25,000 gallons/day of water by 18,000 gallons. This large discharge was a one time occurrence caused by flooded plant conditions: the floodwater drained into the sanitary manholes. Buzz Rahier/RPI telephoned Cynthia Wellner of METRO on January 12 when he prepared the calculations for and submitted the monthly discharge report. Buzz informed her of the exceedence; she noted it as a one time occurrence and stated there was no problem with this one occurrence. In order to minimize the potential for recurrence, RPI has installed an automated float switch on the pump for the storm water system.

### *Task A3-Interim Measures*

On January 17, RPI met with 3 contractors (Westinghouse, OHM, and CEcon) who have been asked to bid on the remediation of a PCB contaminated concrete compressor pad.

Monitoring wells at the Facility were monitored for LNAPL on January 10, 1994. The survey (log attached) indicates that LNAPL is present in some wells.

### *Task A6-RFI Data Evaluation & Report*

Work continued on the RFI report.

## Deliverables Submitted

The December Progress Report was submitted to U.S. EPA on January 10, 1995.

## Activities Planned During Next Reporting Period

### *Task A2-Applicable Regulations and Permits*

The General Stormwater NPDES permit application for site construction activities and the land altering permit application (which addresses drainage, grading and hauling) will be submitted once the SEPA checklist is approved by the City of Tukwila.

A letter will be prepared to submit to Ecology responding to their concerns about sediment sampling.

### *Task A3-Interim Measures*

Continue to monitor LNAPL thicknesses in monitoring wells.

The PCB-contaminated compressor pad will be removed one the contractor is identified.

## *Task A6-RFI Data Evaluation & Report*

The RFI report will be submitted to U.S. EPA and Ecology on February 7, 1994. A presentation will be made to EPA and Ecology on February 17, 1994.

*pal/rhône-p/MSR1-95.EPA*

# RHONE POULENC - E. Marginal Way Facility
## LNAPL SURVEY LOG
### Floating Product Layer Thickness in Feet

| MW | 6/7/94 | 6/8/94 | 6/17/94 | 8/4/94 | 9/8/94 | 10/6/94 | 11/3/94 | 12/5/94 | 1/11/95 | 2/95 | 3/95 | 4/95 | 5/95 | 6/95 | 7/95 | 8/95 | 9/95 | 10/95 | 11/95 | 12/95 |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| H10 | 0.0 | 0.0 | Film | Film | Film | 0.0 | 0.0 | 0.0 | 0.26[3] | | | | | | | | | | | |
| H1 | | | 0.0 | Sheen | 0.0 | 0.0 | 0.0 | 0.0 | Sheen[4] | | | | | | | | | | | |
| MW12 | 0.0 | 0.0 | 0.007[1] | Sheen | Film | Film | 0.005 | 0.0 | Sheen[4] | | | | | | | | | | | |
| H11 | | | 0.0 | Film | 0.010 | 0.010 | 0.005 | Film | 0.04[3] | | | | | | | | | | | |
| DM7 | | | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | | | | | | | | | | | |
| H9 | | | 0.0 | 0.0 | Sheen | 0.0 | 0.0 | 0.0 | 0.0 | | | | | | | | | | | |
| H6 | | | 0.0 | 0.0 | Sheen | 0.0 | 0.0 | 0.0 | 0.0 | | | | | | | | | | | |
| DM2A | | | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | | | | | | | | | | | |
| DM2B | | | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | | | | | | | | | | | |
| DM8 | | | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | | | | | | | | | | | |
| A9 | | | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | | | | | | | | | | | |
| DM3A | | | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | | | | | | | | | | | |
| DM3B | | | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | | | | | | | | | | | |
| A2 | | | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | | | | | | | | | | | |
| A4 | | | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | | | | | | | | | | | |
| DM4 | | | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | | | | | | | | | | | |
| B4 | | | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | | | | | | | | | | | |
| B2 | | | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | | | | | | | | | | | |
| DM5 | | | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | | | | | | | | | | | |
| B1A | | | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | | | | | | | | | | | |
| B1B | | | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | | | | | | | | | | | |
| C1 | | | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | | | | | | | | | | | |
| DM6 | | | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | | | | | | | | | | | |
| B5 | | | 0.0 | 0.0 | 0.0 | ---[2] | ---[2] | ---[2] | ---[2] | | | | | | | | | | | |
| G3 | | | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | | | | | | | | | | | |
| G1 | | | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | | | | | | | | | | | |
| B6 | | | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | | | | | | | | | | | |
| MW13 | | | | | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | | | | | | | | | | | |
| MW14 | | | | | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | | | | | | | | | | | |
| MW15 | | | | | 0.021 | Film | 0.010 | Film | 0.01[3] | | | | | | | | | | | |
| MW16 | | | | | 0.005 | 0.0 | 0.0 | 0.0 | 0.0 | | | | | | | | | | | |
| MW17 | | | | | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | | | | | | | | | | | |
| MW18 | | | | | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | | | | | | | | | | | |
| MW19 | | | | | 0.010 | 0.021 | 0.0 | 0.0 | Sheen[4] | | | | | | | | | | | |
| MW20 | | | | | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | | | | | | | | | | | |

[1] Removed product layer with bailer.
[2] Buried under rubble.
[3] Solinst Model 121 oil/water interface probe.
[4] Sheen noted when measurement device was placed in clean water.

Note: Shaded areas reflect current LNAPL survey.

*pal/general/lnapl.dec*